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Subject: EI Write-up for Exide (GNB, Inc) CAD097854541

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Michael- Here is my write-up for our discussion on February 25, 2004 on Exide. Please make your edits as appropriate.

A conference call was held on February 25, 2004 to discuss the latest developments towards achieving EIs (Human Health and Ground Water) for the Exide (GNB, Inc) facility. Michael Choe, Liang Chiang and Phil Chandler (DTSC) and Mitch Kaplan (EPA) participated on the call.

Exide (GNB, Inc.) has filed for bankruptcy protection under Chapter 11 in April of 2002. It has since undergone reorganization and continues to operate. The facility is pursuing an operating permit from DTSC and plans to close 20 tanks under this permit. A series of NODs (notice of deficiency) have been issued with revisions to the permit application still needed to be made. DTSC's best estimate for permit issuance is within 6 months. DTSC prepared a cost estimate for bankruptcy which delayed the permit issuance process. Cost estimates for closure, post-closure care and corrective action were also prepared by DTSC.

An RFI Workplan from 1994 is still being reviewed by DTSC. The delays have been due to manpower problems at DTSC. DTSC is now taking a phased approach to the RFI. Phase I would consist of investigating the worst 3-4 SWMUs (Solid Waste Management Units) which would include an acid pit and a slag pile. Solvents in soils and low pH in ground water are among the areas that need to be investigated first. A soil gas survey will need to be conducted for the solvents in soils and a stream sediment sampling effort will be needed to determine if contamination from a drainage ditch which runs through the facility has impacted the LA River. DTSC would require revisions to the RFI Workplan within 60 days with work beginning as early as June 2004. The investigation could be completed within 3 months with an RFI report submitted by the end of 2004. Based on these results, a phase II RFI Workplan would be requested to address additional SWMUs during 2005.

Human Health EI Exposure Pathways- There is a drainage ditch that runs across the facility and ends at the Los Angeles River. There has been deposition of lead dust from the facility into the drainage ditch which has likely moved offsite. The site interior is cleaned daily with residues removed. A human health risk assessment has been completed and shows acceptable risk for both onsite and offsite exposures for current facility operations. The City of Vernon has a group of drinking water supply wells located approximately 1 mile from the facility boundary. We have historical information from the City of Vernon that contaminants have not been detected in any of their water supply wells. Verification from the City of Vernon is needed that ground water is currently unaffected by contamination that could be originating from Exide.

The following need to be accomplished before a Human Health EI can be achieved:

- 1) Sediments located at the confluence of the drainage ditch and the LA River need to be sampled.
- 2) A letter to the City of Vernon addressing ground water sampling data from their drinking water wells needs to be sent- within 30 days. If the City of Vernon confirms that contaminants have not been detected, then the human health EI could be attained.
- 3) Verify that there is fencing along the drainage ditch between the facility boundary and the LA River preventing human access to the ditch.

If these items are accomplished on schedule, then the human health EI can be met by September 2005.

Ground Water EI- The City of Vernon has a group of drinking water supply wells located approximately 1 mile from the facility boundary. It is not known whether there is a complete ground water flow pathway between ground water contaminated beneath the facility and the aquifer which supplies Vernon's drinking

water. There are currently 11 ground water monitoring wells located on the facility property. Data indicates that there is contamination beneath the facility at the facility boundary indicating that contamination has migrated offsite. The facility currently has no plans for remediation of ground water contamination.

Next steps needed to achieve the ground water EI- An RFI Workplan (phased approach) will be required to facilitate the ground water characterization effort.

- 1) Install additional ground water monitoring wells as part of the closure of the tanks. This should occur during 2005.
- 2) Installation of nested monitoring wells to characterize horizontal and vertical ground water movement. Ground water in the interior of the site would be characterized first.
- 3) Based on the results of the onsite ground water characterization, offsite ground water will then need to be characterized. This is not likely to occur until 2006.

Based on the status of ground water characterization and lack of remediation, it is unlikely that the ground water EI can be met by September 2005.